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Attorneys for Defendant HYDE CAVIAR, LLC

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

JUAN JOHNSON, an individual

Plaintiff,

v.

HYDE CAVIAR, LLC, a Delaware limited
liability company,

Defendant.

Case No. 2:23-cv-00961-JAM-KJN

**STIPULATION FOR ARBITRATION
AND ORDER**

1 Plaintiff Juan Johnson (“Plaintiff”) and Defendant Hyde Caviar, LLC (“Defendant”)
2 (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree as
3 follows:

4 1. Plaintiff filed his Complaint in the Superior Court of California, County of
5 Sacramento, on April 13, 2023, in Case No. 34-2023-00337875-CU-WT-GDS (the “Action”).

6 2. Defendant subsequently removed the Action to this Court.

7 3. The Parties have agreed to arbitrate Plaintiff’s claims alleged in the Action as
8 required by the Parties’ At-Will Employment, Confidential Information, Invention Assignment,
9 and Arbitration Agreement.

10 4. The arbitration shall be with JAMS pursuant to the JAMS Employment Arbitration
11 Rules and Procedures.

12 5. In light of the foregoing facts, the above-captioned case shall be stayed in its
13 entirety pending the outcome of the arbitration, subject to a later motion to confirm the arbitration
14 award, if any.

15 IT IS SO STIPULATED.

16 Dated: July 18, 2023

TOWER LEGAL GROUP, PC

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18 By: /s/Ariel A. Pytel (as authorized on 7/18/2023)
19 ARIEL A. PYTEL
Attorneys for Plaintiff JUAN JOHNSON

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21 Dated: July 18, 2023

REYNOLDS TILBURY WOODWARD LLP

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23 By: /s/Avalon Johnson Fitzgerald
24 AVALON JOHNSON FITZGERALD
Attorneys for Defendant HYDE CAVIAR, LLC

ORDER

The parties having stipulated, and good cause appearing, it is HEREBY ORDERED that:

1. Plaintiff's claims in the above-captioned case shall be SUBMITTED TO ARBITRATION before JAMS and arbitrated per the JAMS Employment Arbitration Rules & Procedures.

2. The above-captioned case shall be **STAYED** in its entirety pending the arbitration, subject to a later motion to confirm the arbitration award, if any.

3. The parties are **ORDERED** to file a Joint Status Report pursuant to the provisions of F.R.Cv.P. 16 and 26, in accordance with Local Rule 240 and the Court's Order Requiring Service of Process and Joint Status Report or dispositional documents, **within thirty (30) days after** completion of arbitration. Failure to timely file may result in the imposition of sanctions.

IT IS SO ORDERED.

Dated: July 21, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE